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Attorneys for Liberty Mutual Insurance Company and
Wausau Underwriters Insurance Company

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

_____)	
In re:)	Chapter 11
)	
SHAPES/ARCH HOLDINGS L.L.C., <i>et al.</i> ,)	Case No. 08-14631 (GMB)
)	
Debtors.)	Hon. Gloria M. Burns
_____)	

**NOTICE OF WITHDRAWAL OF CLAIMS OF
LIBERTY MUTUAL INSURANCE COMPANY AND
WAUSAU UNDERWRITERS INSURANCE COMPANY
(Claim Nos. 561, 563, 564, 586, 587, 588, 589, 591, 592, 593)**

PLEASE TAKE NOTICE that, subject to the provisions of Debtors' Third Amended Joint Chapter 11 Plan of Reorganization, as modified [Doc. Nos. 338 and 545] (the "Plan")¹ and the Order confirming the Debtors' Third Amended Joint Chapter 11 Plan of Reorganization, as modified [Doc. No. 561] (the "Confirmation Order"), and expressly preserving and not impairing

¹ Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in the Debtors' Third Amended Joint Chapter 11 Plan of Reorganization, as modified.

U.S. BANKRUPTCY COURT
FILED
CAMDEN, NJ
08 OCT 20 AM 10:12
JAMES J. WALDRON
BY: _____
DEPUTY CLERK

in any way the rights and interests of Liberty Mutual Insurance Company and Wausau Underwriters Insurance Company (collectively, "Liberty Mutual") arising thereunder or under any of the insurance policies issued by Liberty Mutual, Liberty Mutual, by and through the undersigned counsel, hereby withdraws the following proofs of claim filed by Liberty Mutual in the above-captioned bankruptcy proceedings:

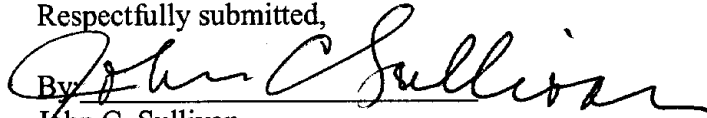
- (a) Claim No. 561 by Wausau Underwriters Insurance Company against Shapes L.L.C.
- (b) Claim No. 563 by Liberty Mutual Insurance Company against Shapes/Arch Holdings, L.L.C.
- (c) Claim No. 564 by Liberty Mutual Insurance Company against Shapes L.L.C.
- (d) Claim No. 586 by Liberty Mutual Insurance Company against Ultra L.L.C.
- (e) Claim No. 587 by Wausau Underwriters Insurance Company against Shapes/Arch Holdings, L.L.C.
- (f) Claim No. 588 by Wausau Underwriters Insurance Company against Accu-Weld L.L.C.
- (g) Claim No. 589 by Liberty Mutual Insurance Company against Accu-Weld L.L.C.
- (h) Claim No. 591 by Liberty Mutual Insurance Company against Delair L.L.C.
- (i) Claim No. 592 by Wausau Underwriters Insurance Company against Delair L.L.C.
- (j) Claim No. 593 by Wausau Underwriters Insurance Company against Ultra L.L.C.

provided, however, that the withdrawal of these proofs of claim is not and shall not be construed as a waiver of any of the Liberty Mutual's rights, remedies, claims, causes of action, defenses, affirmative defenses, or any other rights against any of the Reorganized Debtors and/or their affiliates outside of the above-captioned bankruptcy proceedings; and provided, further, that the withdrawal of these proofs of claim shall not discharge, release or otherwise affect the applicable

Reorganized Debtors' obligations, if any, to Liberty Mutual under any of the insurance policies issued by Liberty Mutual and assumed under the Plan.

Dated: October 17, 2008

Respectfully submitted,

By 

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**CERTIFICATE OF SERVICE OF NOTICE OF WITHDRAWAL OF CLAIMS OF
LIBERTY MUTUAL INSURANCE COMPANY AND WAUSAU UNDERWRITERS
INSURANCE COMPANY (Claim Nos. 561, 563, 564, 587, 588, 589, 591, 592, 593)**

The undersigned certifies that on October 17, 2008, I served or caused to be served a copy of the Notice of Withdrawal of Claims of Liberty Mutual Insurance Company And Wausau Underwriters Insurance Company (Claim Nos. 561, 563, 564, 586, 587, 588, 589, 591, 592, 593) via (a) ECF notification for those parties registered and (b) first-class mail, postage prepaid, to the following:

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Donna H. Lieberman
Halperin Battaglia Raicht, LLP
555 Madison Avenue, 9th floor
New York, New York 10022
(Class 10 Liquidation Trustee)

Dated: October 17, 2008

A handwritten signature in cursive script, reading "John C. Sullivan". The signature is written in dark ink and is positioned to the right of the date.

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